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and Vestas-American Wind Technology, Inc.

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**In re VESTAS WIND SYSTEMS A/S  
SECURITIES LITIGATION**

**This Document Relates to:**  
  
**ALL ACTIONS**

**Case No. 3:11-cv-00585-AC**

**CLASS ACTION**

**VESTAS WIND SYSTEMS A/S AND  
VESTAS-AMERICAN WIND TECHNOLOGY,  
INC.'S MOTION TO DISMISS PLAINTIFFS'  
FIRST AMENDED COMPLAINT**

**ORAL ARGUMENT REQUESTED**

**Local Rule 7-1 Certification**

Pursuant to Local Rule 7-1, the parties made a good-faith effort through personal or telephone conferences to resolve the issues in dispute in this Motion to Dismiss, but have been unable to do so.

**Motion**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendants Vestas Wind Systems A/S and Vestas-American Wind Technology, Inc. (collectively, "Vestas") respectfully move to dismiss all claims in plaintiffs' First Amended Complaint for Violation of the Federal Securities Laws (the "Complaint"), with prejudice. The reasons for this motion are stated in the accompanying Memorandum of Law and the Declaration of Jonathan E. Richman, Esq., filed concurrently with this motion.

Defendant Henrik Nørremark is filing a separate motion to dismiss the Complaint. Pursuant to the Court's Order dated March 27, 2013, defendants Bent Erik Carlsen and Ditlev Engel have an extension of time to respond to the Complaint until 60 days after the Court rules on Vestas' Motion to Dismiss.

Dated: April 22, 2013

Respectfully submitted,

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